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PACIFIC  TELESIS  
Group-Washington

March 31, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

Dear Mr. Caton:

Re: CC Docket No. 92-105, *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of

The Use of N11 Codes and Other Abbreviated  
Dialing Arrangements

CC Docket No. 92-105

**COMMENTS OF PACIFIC TELESIS GROUP**

Pacific Telesis Group ("Pacific") files these comments in response to the *Further Notice of Proposed Rulemaking* released February 19, 1997. In the *Notice*, the Commission seeks comment on implementation of 711 for TRS, as well as administration issues relating to N11 codes.

**Summary**

Until more details are known about the requirements needed to provide 711 access, we are unable to give reliable input on implementation, timeline or costs. To the extent we incur costs to implement 711 access, we must have a method of recovering those costs. And, we agree with the Commission that N11 codes should not be sold or transferred, and that the new NANP administrator should administer N11 codes.

The Commission tentatively concludes that nationwide implementation of 711 for TRS access should occur within three years of the effective date of the First Report and Order,

and seeks comment on that tentative conclusion.<sup>1</sup> The Commission has put the cart before the horse. Later in the *Notice*, the Commission seeks comment on how 711 access should work. No decisions have been made as to what the 711 access will look like, whether it will involve a design of a gateway, whether network rearrangements will be necessary, how many providers will be accommodated, etc. Until these key design decisions are made, guessing at the reasonableness of an implementation timeline is imprudent. The Commission should hold its concern with the timeline for implementation until it reaches some tentative conclusions with respect to the other issues raised in this docket.

We are particularly concerned with the implementation timing due to the other pressures faced by our business. Implementation of the Telecommunications Act, and the state of competition in California has put tremendous pressure on our resources and personnel. Major operational implementations are occurring during the next three years: continued work implementing local competition, local number portability, and 10 area code relief programs. These important implementations must be considered before additional work is mandated.

In terms of how 711 access may be designed, it will be relatively easy to design 711 to permit a customer to dial those digits and be connected to the state-approved TRS provider. This requires only a translation change within each switch. However, three issues arise. First, if 711 is to be used by all TRS customers (both voice and text), then the TRS provider must be able to recognize once the calls are forwarded to them how to treat each call. Today, 3 different 800 numbers are used for TRS access in California--one for voice, one for text, and one for speech-to-speech (for those with speech difficulties). If one 711 number is used

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<sup>1</sup> *Notice*, ¶68.

for access, the TRS provider must be able to determine the services the customer will need.

Second, the California Deaf and Disabled Trust, which administers the state TRS program, is currently searching for ways to encourage other TRS providers to enter the market (in addition to the TRS provider chosen through the competitive bid process). Other providers could provide equivalent access under the current system by simply using a different 800 access number.

Using 711 as the sole access number may discourage this sort of competition. Third, implementing this simple use of 711 will require expenditures for performing the translation and testing necessary. Since we are not compensated by the current TRS system, some cost recovery methodology must be designed. In addition, as stated earlier, given the resource pressures of all of the operational implementations, this "simple" 711 solution may in fact be problematic to implement.

In the *Notice*, the Commission seeks comment on the implementation process and timeline for 711 access.<sup>2</sup> As stated earlier, it is difficult to answer these specific questions given the lack of specificity as to how the 711 service will be configured. While the Commission mentions a gateway as a potential component of a 711 product, it is unclear what that gateway would do, what customer requirements were being addressed, where it would reside (in the LEC network, or with the TRS provider), who would design and build it, who would maintain it, etc. The answers to these questions will determine the implementation timelines, the feasibility of the 3 year period, and the costs that will be incurred.

If we incur costs for any of the steps which need to occur within our network, cost recovery must be addressed. We do not receive any money from the TRS funds, state or federal,

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<sup>2</sup> *Notice*, ¶67.

and we are not TRS providers. Thus, if we need to design or place functionality within our network, we must have a method of recovering those costs.

The Commission also seeks comment on certain issues relating to N11 administration.<sup>3</sup> We do not support permitting the sale or transfer of N11 codes. We agree with the Commission that numbers are a public resource, and therefore should be not bought, sold, auctioned, or otherwise treated as a commodity. In addition, the Commission seeks comment on whether N11 codes administration should be transferred from incumbent LECs to the neutral NANP administrator to be recommended by the NANC. We agree with this approach.

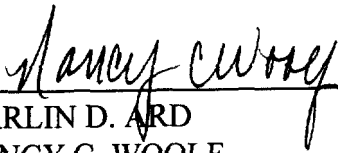
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<sup>3</sup> Notice, ¶69-75.

Particularly if N11 codes have national application, it is reasonable for a neutral third party to administer these codes for the nationwide applications.

Respectfully submitted,

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